

# **FRANKLIN, GRINGER & COHEN, P.C.**

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January 17, 2023

Via ECF

The Honorable LaShann DeArcy Hall  
United States District Judge for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Paschalidis v. The Airline Restaurant Corp., et al.,  
Docket No.: 20-cv-2804(LDH)(RLM)

Dear Judge DeArcy Hall:

We represent Defendants The Airline Restaurant Corp., James Meskouris, and Peter Meskouris (all three, together as “Defendants”), in the above-referenced matter. We write, jointly on behalf of all parties, pursuant to the Court’s Electronic Order dated January 3, 2023, which directed the parties to submit the instant letter concerning mediation by today. *See* Electronic Order dated January 3, 2023. As the parties advised in their December 21, 2022 status report, the parties are still engaging in Mediation and will be discussing a possible global settlement of all of Plaintiff’s claims brought in both Federal Court and New York State Court. ECF No. 70. At this time, the parties have retained the services of mediator Andrew A. Kimler, Esq., and are still in the process of discussing the necessary logistics and scheduling the mediation, much of which is centered on Plaintiff’s State Court lawsuits. In the meantime, the parties intend on proceeding with motion practice in this Court, for which, on January 6, 2023, they jointly requested a forty-five-day extension of time to submit their respective pre-motion conference requests for their anticipated summary judgment motion pursuant to Fed. R. Civ. P. 56 and in accordance with Rule III(A)(6) of Your Honor’s Individual Practices. ECF No. 71. The requested forty-five-days would extend the deadline from January 12, 2023 to February 27, 2023.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

**FRANKLIN, GRINGER & COHEN, P.C.**



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Danielle E. Mietus, Esq.

C: All Counsel of Record (*via* ECF)